

Exhibit 2

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)
RUDOLPH W. GIULIANI) Chapter 11
a/k/a RUDOLPH WILLIAM GIULIANI,) Case No. 23-12055
Debtor.)
)

**ORDER SETTING STATUS CONFERENCE ON HERRING PARTIES'
MOTION FOR ENTRY OF ORDER CLARIFYING WHETHER THE AUTOMATIC
STAY APPLIES TO STAY NON-DEBTOR DISCOVERY IN LITIGATION**

The Court considered the *Motion for Entry of Order Clarifying Whether the Automatic Stay Applies to Stay Non-Debtor Discovery in Litigation* (the “Motion”) filed by Herring Networks, Inc. d/b/a One America News Network, Charles Herring, Robert Herring, Sr., and Chanel Rion, and having found that the Court has jurisdiction pursuant to 28 U.S.C. § 1334; and having found that this is a core proceeding within the meaning of 28 U.S.C. § 157; and having found that venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and upon all proceedings before this Court, IT IS HEREBY ORDERED THAT:

A status conference on the Motion will take place on _____, 2024 at ___:_ a/p.m. (prevailing Eastern Time) before the Honorable Sean H. Lane via Zoom. Parties wishing to participate in the hearing must register their appearance utilizing the Electronic Appearance portal located on the Court’s website at: <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. Appearances must be entered no later than 4:00 p.m. EST on the business day prior to the hearing. Additional information concerning how to participate in the hearing is available in the Court’s Zoom Video Hearing Guide, available at: <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>. It is further

ORDERED that the movant's counsel shall file a certificate of service of this Order and the Motion with the Clerk of the Court by 12:00 noon at least seven (7) days before the date of the status conference.

Dated: _____, 2024
White Plains, New York

UNITED STATES BANKRUPTCY JUDGE